

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Brock Fredin,

Plaintiff,

v.

Case No. 0:20-cv-01929-SRN-HB

Jamie Kreil,

Defendant.

**THIRD DECLARATION OF ANNE M. LOCKNER IN SUPPORT OF
JAMIE KREIL'S REPLY MEMORANDUM IN SUPPORT OF HER MOTION
FOR TERMINATING SANCTIONS, A TEMPORARY RESTRAINING
ORDER, AND ATTORNEYS' FEES**

Pursuant to 28 U.S.C. § 1746, I, Anne M. Lockner, declare:

1. I am a partner at Robins Kaplan LLP, counsel for Defendant Jamie Kreil. I submit this declaration in support of Jamie Kreil's reply memorandum in support of her emergency motion for terminating sanctions, a temporary restraining order, and attorneys' fees.

2. I, along with my colleagues Ena Kovacevic, Haynes Hansen, and Charlie Gokey represent Jamie Kreil in this matter *pro bono*.

3. In the days following Kreil's Emergency Motion for Terminating Sanctions, Fredin retaliated with more defamatory and harassing videos – one further defaming me, another further defaming Mr. Hansen, and another targeted against Mr. Gokey.

4. These videos are also hosted on Fredin's YouTube Channel, "Judicial Protest."

5. The video directed to Mr. Gokey largely repeats the same or similar false statements that Fredin lodged against me, Ms. Kovacevic, and Mr. Hansen in his earlier videos and web postings.

6. These statements include that Mr. Gokey is a "crooked social justice warrior attorney," that he is "corrupt" and is attempting to unethically "curry[] favor with the U.S. Attorney's Office," and that he "fabricates allegations in an effort to smear local citizens."

7. The statements in the video are false.

8. Attached hereto as Exhibit A is a true and correct pdf image of the video currently hosted at <https://youtu.be/2ydfF2vm4MY>, and is titled "Charlie Gokey - Minneapolis's Most Crooked Attorney."

9. At the time of this declaration, this video has been viewed 27 times.

10. Fredin knows of Mr. Gokey's involvement in the case only because Mr. Gokey has emailed Fredin in relation to motions that Kreil has filed and motions that Fredin has threatened to file.

11. The video directed against me repeats statements that I am racist and speculates that I "only hire white attorneys" and features Robins Kaplan's logo in front of the confederate flag.

12. The statements in the video are false.

13. Attached hereto as Exhibit B is a true and correct pdf image of the video currently hosted at <https://youtube.com/watch?v=QFVYNQnlecg>, and is titled “Anne M. Lockner – Racist Attorney?”

14. At the time of this declaration, this video has been viewed 1,356 times.

15. The video targeted at Mr. Hansen features text promoting Mr. Hansen as an expert in ranching and agricultural law and pictures of Mr. Hansen and ranching scenes, all while an extremely graphic voiceover describes gay sex.

16. Attached hereto as Exhibit C is a true and correct pdf image of the video currently hosted at <https://youtube.com/watch?v=8OKrqkvOCZM>, and is titled “Haynes Hansen – Minnesota’s Premier Ranching Lawyer.”

17. At the time of this declaration, this video has been viewed 2,414 times.

18. The latest video directed at me refers to me as “Minneapolis’ Sexiest Attorney” and falsely claims that I am a “2X champion of the Minnesota Bar Association wet t-shirt contest” set to vulgar images and music.

19. Attached hereto as Exhibit D is a true and correct pdf image of the video currently hosted at https://www.youtube.com/watch?v=_JSkH5r52ao, and is titled “Anne M. Lockner – Minneapolis’ Sexiest Attorney.”

20. As of the morning that I signed this declaration, the video has already been viewed 247 times, despite having been posted less than 24 hours ago.

21. We will file a thumb drive containing electronically archived versions of Exhibits A, B, C, and D with the Court as soon as is practicable. Kreil and her counsel ask that the Court view these electronically archived versions of the videos rather than the live links to avoid increasing the search rankings of the videos through repeated viewing.

22. The above videos have prompted Robins Kaplan to receive concerned inquiries by phone and through the firm's web contact form from individuals who have come across Fredin's defamatory postings about Kreil's counsel and found them disturbing.

23. Attached hereto as Exhibit E is a true and correct copy of one example of a notice Robins Kaplan received about Fredin's postings that describes one of Fredin's posts as "absolutely disgusting."

24. Attached hereto as Exhibit F is a true and correct copy of another example of a notice Robins Kaplan received about Fredin's postings.

25. The contact information in Exhibits E and F has been redacted to protect the privacy of these individuals.

26. Moreover, it appears that Fredin has begun paying YouTube to promote some of his videos targeting Kreil's counsel.

27. It is my understanding that YouTube permits users to pay to promote specific videos, which causes YouTube to serve those videos as advertisements to YouTube users. Comments on Fredin's more heavily viewed videos suggest the commenters were directed to the videos in this manner. The concerned inquiries Robins Kaplan has received about the videos have indicated the same. This further explains why most of Fredin's videos have accrued only a few dozen views, while others have racked up several thousand views in only a few weeks.

28. Fredin continued creating and posting videos to his "Judicial Protest" up until shortly before the deadline to oppose Kreil's Motion for Sanctions and beyond, the latest (one targeting an individual other than Kreil's counsel and one targeting me) having been posted on October 31 and November 11, 2020, respectively.

I declare, under penalty of perjury, that the foregoing is true and correct.
Executed this 12th day of November, 2020, in Minneapolis, MN.

By: s/*Anne M. Lockner*